

Division Director Briefing – Hunters Point April 15 Meeting

Suggested Agenda

1. Logistics
 - a. 1st floor conference rooms, 10 am – 12 pm
 - b. See attached list of attendees – Grant Cope?
2. Outstanding Issues
 - a. Buildings - PRG Calculator & RESRAD
 - i. Fixed – scan floor, walls, ceilings
 - ii. Dust – count time for swipes
 - b. Timing, estimate Feb. 2020 start testing trenches
 - i. Separation of soil from buildings
 - ii. Don't start testing trenches until settle reference background
 - c. Transparency
 - i. Five Year Review – include PRG Calculator, comment period
 - ii. Parcel G Workplan & addenda drafts – public review opportunities
 - iii. FOIA lawsuits, Information Repositories, BRAC website
3. EPA Proposal – process
 - a. Technical staff level mtgs
 - i. BPRG Calculator
 - ii. RESRAD
 - b. Documentation - Dual analysis
 - i. BPRG Calculator, seek EPA concurrence
 - ii. RESRAD – if want to document, then can either get EPA concurrence or if not then state does not have EPA Concurrence
4. Suggested draft agenda and talking points (attached)
5. Next steps

Expected attendees as of 4-9-2019

1. Navy
 - a. Laura Duchnak
 - b. Lawrence Lansdale
 - c. Kim Ostrowski
 - d. Thomas Machiarella
 - e. Derek Robinson
 - f. Stephen Banister (Acting Lead RPM and staff lead on Five Year Review)
 - g. Paul Stoick (staff lead on Parcel G Work Plan)
 - h. Marvin Norman (attorney)
2. DTSC
 - a. Grant Cope, Acting Deputy Director
 - b. Julie Pettijohn, Section Manager (tentative)
 - c. Nina Bacey, RPM (in person)
3. CDPH (by phone?)
 - a. Anthony Chu
 - b. Christopher Pace (branch manager)
 - c. Sheetal Singh (section manager)
 - d. Shane Reese (Health Physicist)

Suggested agenda April 15 meeting

1. Introductions
2. EPA Proposed path forward – recap letter
 - a. Cleanup values
 - b. Timing
 - c. Transparency
3. Proposed process
 - a. Technical discussions – staff only
 - i. PRG Calculator
 - ii. RESRAD
 - b. Timing – parallel processes
 - i. Soil vs. Buildings
 - ii. Start of trenches/building site soil testing
 - c. Public involvement
 - i. PRG Calculator and comment periods
 - ii. Make info available to requestors
4. Next steps

Talking Points

- It is in the interest of all of us to move forward with testing in the field as soon as possible. You have received my two letters that propose a path forward to accomplish just that. I and my staff have had numerous conversations consistent with the proposal, so I do not believe that any of this should be a surprise.

Long Term Protectiveness

- We thought we were making progress through a series of conference calls with technical staff on use of the PRG Calculator for soil and for buildings for a commercial/industrial/demolition scenario. We have offered multiple times over the last month to continue these technical discussions for the buildings residential scenario. I strongly recommend that you share your calculations and resume these discussions. We believe that more site specific parameters can be varied, consistent with the national users guide.
- I understand that you want to use RESRAD at this late date. EPA recommends the PRG Calculator, and I believe we had made good progress using it. If you really want to use RESRAD, our guidance can allow that with Headquarters consultation to ensure that the site-specific parameters used in RESRAD would be applied in a way consistent with the National Contingency Plan. However, I also recommended that in the interest of time, for the soil and buildings (commercial scenario), for efficiency, you should complete the PRG Calculator assessments, as we are close to agreement. Even if you want to do analysis using RESRAD, you should address the comparison between that and PRG Calculator assessments, since that is EPA's recommended approach, and the public will expect that approach.

Timing

- We have proposed to give partial approvals to allow soil work to begin. We also believe that the start time for trench testing does not need to wait until February, 2020.

Transparency

- We only earn trust when we are all transparent to the public. We therefore recommend releasing long term protectiveness assessments to the public
- We are all inundated with FOIA or Public Records Act requests. The Navy is the lead agency. Your Administrative Record incomplete in both physical & electronic form. The Navy does not respond to FOIA requests and press questions in a timely manner. The result is that requestors go to EPA, DTSC, and CDPH. If you can improve accessibility of documents and your responsiveness, we will be able to move more quickly on review/approval of your documents.

DRAFT

Outstanding Issues

1. BPRG Calculator
 - a. Practical detection - Scan speed inside buildings
 - b. EPA runs
 - i. Fixed – scan floor, walls, ceilings
 - ii. Dust – count time for swipes
2. Timing
 - a. Separation of soil from buildings
 - b. Don't start testing trenches until settle reference background
3. Transparency
 - a. Five Year Review – PRG Calculator include, comment period
 - b. Parcel G Workplan & addenda drafts – public review opportunities
4. Legal documentation
 - a. Post-ROD change for changes in RG's
 - b. Gamma scan – technical impractical
5. Buildings scan technical approach – could address at the Addendum stage